

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Ryan Dunbar

Case: 2:23-mj-30065

Assigned To : Unassigned

Assign. Date : 2/14/2023

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2022 through December 7, 2022 in the county of Macomb and elsewhere in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 USC §§ 2252A(a)(2) and 2252A(a)(5)(B)

Offense Description

Receipt and possession of child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 14, 2023

City and state: Detroit, Michigan

*Complainant's signature*Michelle A. Harmon, Special Agent (FBI)*Printed name and title**Judge's signature*Hon. Elizabeth A. Stafford, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Michelle A. Harmon, a Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a special agent with the FBI since 2000. I am currently assigned to the Detroit Field Office, Macomb County Resident Agency. As part of my official duties, I investigate crimes involving the sexual exploitation of minors, including criminal offenses pertaining to online enticement and the illegal production, distribution, receipt, and possession of child pornography. I have received training in the proper investigative techniques for violations pertaining to child pornography and child exploitation. I have conducted and assisted in numerous child exploitation investigations, to include undercover operations to identify and locate individuals who seek to engage in sexual activity with minors, and have executed search warrants that have led to seizures of child pornography. I have also received training in computer systems, computer networks, and mobile devices. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A, and I am authorized by law to request a complaint and arrest warrant.

2. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Ryan Dunbar (DOB ***/**/1992) for violations of

18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B).

3. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents and state and local law enforcement officers; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcements officers; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish that Ryan Dunbar has violated 18 U.S.C. §§ 2252A(a)(5)(B) and 2252A(a)(2).

BACKGROUND OF INVESTIGATION

4. On December 7, 2022, FBI agents received information that Amber Dunbar (DOB **/**/1996), residing in Warren, Michigan, was involved in producing and distributing child pornography involving young minor females known to her.

5. On December 7, 2022, law enforcement obtained a search warrant for a residence associated with Amber Dunbar in Warren, Michigan. Amber Dunbar was interviewed during the execution of the search warrant and admitted to recording three videos of herself engaging in sexual activity with a young minor infant known to her and distributing the videos on the social media application Kik.

6. On December 8, 2022, a federal criminal complaint and arrest warrant was obtained for Amber Dunbar for violations of 18 U.S.C. §§ 2251 and 2252A(a)(2), production and distribution of child pornography. On December 14, 2022, Amber Dunbar was indicted in the Eastern District of Michigan for violations of 18 U.S.C. §§ 2251(a) and 2251(e), sexual exploitation of children, and 18 U.S.C. §§ 2252A(a)(2) and 2252A(b)(1), distribution of child pornography.

7. On December 9, 2022, Amber Dunbar's husband, Ryan Dunbar contacted the FBI and stated that there was "stuff" he should have told FBI agents the night of the search warrant on December 7, 2022, but that he was overwhelmed. Ryan Dunbar stated that Amber Dunbar took nude pictures of another young female known to her and had sent them to him. Ryan Dunbar believed the photos were sent to him through text messages. Ryan Dunbar stated the photos were of a young female sitting naked on the floor with her legs spread, and in the bathtub with her legs spread. Ryan Dunbar stated that Amber Dunbar sent him the photos while she was visiting with the young female child in Shelby Township, Michigan, and while Ryan

Dunbar was at home in Warren, Michigan. Ryan Dunbar stated that he and Amber Dunbar have engaged in text messages where the two discuss what they want to do sexually with this minor female child. Ryan Dunbar claimed that he did not have a sexual interest in children and only engaged in these conversations to go along with Amber Dunbar.

8. Ryan Dunbar's cell phone, a Galaxy S9, was seized during the execution of the search warrant in Warren, Michigan on December 7, 2022. On December 9, 2022, Ryan signed a "Consent to Search" form for the phone.

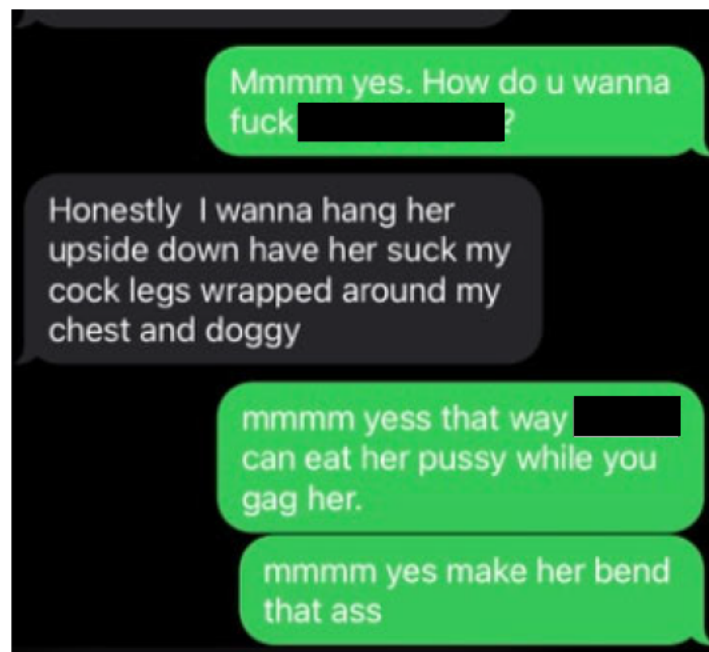
9. I reviewed the forensic extraction of Ryan's phone and observed five photos of a young female child, who appears to be between 4 and 5 years old, that meet the federal definition of child pornography. Four of the images were found in the device's gallery cache file, which indicates they were previously stored in the device's photo gallery and then deleted. One of the images was observed in the device's messaging cache folder, indicating it was received via a messaging application and then deleted. The photos are described as follows:

- One full frontal photo of the young female child laying nude with her hands spreading her vaginal area open. The file information for this photo indicates it was last accessed on the device on 7/29/2022;
- One photo that appears to be cropped from the above photo that features the female child from the neck down with her hands spreading her vaginal area open. The file information for this photo indicates it was last accessed on the device on 7/22/2022;

- One photo that appears to be cropped from the above photo of the nude female child that is a close-up of the child's hands spreading her vaginal area open. The file information for this photo indicates it was last accessed on the device on 7/22/2022;
- One photo of a young female child's vaginal area that appears to have been taken in a bathtub. The file information for this photo indicates it was last accessed on the device on 11/22/2022; and
- One photo of a female child from the waist down, sitting on the floor with her legs bent and spread so that her vaginal area is exposed. The file information for this photo indicates it was last accessed on the device on 10/11/2022.

10. Others that know the female child described by Ryan Dunbar have identified her in at least one of those photographs.

11. I also have observed screenshots of a conversation between Ryan Dunbar and Amber Dunbar from Amber Dunbar's phone where they discuss their desire to sexually assault this child. A small portion of it is pasted below:



12. I believe that Ryan Dunbar likely received the above-described images between July 2022 and November 2022 based on the listed file access dates.

CONCLUSION


13. Based on the foregoing, there is probable cause to believe Ryan Dunbar received child pornography, in violation of 18 U.S.C. § 2252A(a)(2), and possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Respectfully submitted,



Michelle A. Harmon, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.


HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: February 14, 2023